

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,  
Plaintiff,

VS.

IGNACIO VENTURA CRUEL,  
Defendant

CRIMINAL NO. 98-124(PG)

**MOTION REQUESTING RE-SCHEDULING OF**  
**SENTENCING HEARING**

TO THE HONORABLE  
JUAN M. PEREZ-GIMENEZ  
UNITED STATES DISTRICT JUDGE  
FOR THE DISTRICT OF PUERTO RICO

COMES NOW the Defendant, IGNACIO VENTURA CRUEL, through his undersigned attorney, and respectfully states and requests:

1. The above-captioned defendant is currently scheduled to be sentenced on March 23, 2005 at 9:30 a.m.
2. The undersigned will be out of Puerto Rico from March 18 through March 27, 2005. The undersigned also has plans to be out of Puerto Rico from April 8 through April 11, 2005.
3. It is therefore requested that this matter be re-scheduled, to a date convenient to the Court and to the undersigned, and preferably after April 11, 2005.

**WHEREFORE**, it is respectfully requested that this Honorable Court re-schedule the sentencing hearing for Mr. Ventura to a date after April 11, 2005.

**Criminal No. 98-124(PG)**

**2**

**I CERTIFY** that a copy of this motion has been served electronically upon:  
**Assistant United States Attorney Timothy Henwood.**

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, March 17, 2005.

S/Rachel Brill  
USDC No. 204803  
Attorney for the Defendant  
Suite 1113, Mercantil Plaza Building  
Ponce de Leon Avenue  
San Juan, PR 00918  
Tel. (787) 753-6131  
Fax (787) 753-7053  
E-Mail: [rabrill@attglobal.net](mailto:rabrill@attglobal.net)